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December 12, 2019

VIA ECF

Honorable Judge Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, New York

Re: *Cantu-Mariano v. Elite Café Inc. et al.*
Civil Action No. 1:17-cv-03814-SJ-RML

Dear Judge Levy:

My office was retained yesterday in connection with the above captioned matter. We represent B & I Elite Café LLC and Benjamin Haimoff in this action. We have contacted Defendants' prior counsel for the full file, but have yet to receive it.

A review of the docket indicates that Plaintiff's Motion for Partial Summary Judgment is due on December 18, 2019 and Defendants' Reply is due January 17, 2020 with Plaintiff's response due on January 31, 2019.

I respectfully request a stay of the litigation and briefing schedule of one (1) month to allow my firm to receive the file from prior counsel to be able to adequately get up to speed on the litigation and apprise Defendant B & I Elite Café LLC and Benjamin Haimoff of their recourse moving forward. Plaintiff has consented to a one week adjournment.

However, it will be nearly impossible for my firm to adequately get up to speed on a two year litigation in only one week. Moreover, my firm has yet to hear back from prior counsel regarding an orderly transfer of the litigation file despite multiple phone calls and text messages.

I thank the Court in advance for their consideration of this request.

Very truly yours,

/s/ Abraham Hamra
Abraham Hamra, Esq.
Varacalli & Hamra, LLP